

1 THE HONORABLE BARBARA J. ROTHSTEIN
2
3
4
5
6
7
8

9
10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13
14 EVANSTON INSURANCE COMPANY, a
15 company organized under the laws of the
16 State of Illinois,

17 Plaintiff,

18 v.

19 KENNETH ELDON PARKER, an
20 individual; RENEE SHEERAN, an
21 individual,

22 Defendants.

23 No.: 2:22-cv-00195-BJR

24 STIPULATED MOTION AND ORDER
25 FOR TWO MONTH CONTINUANCE OF
26 ALL PRE-TRIAL CASE SCHEDULE
DEADLINES

17
18 **STIPULATED MOTION**

19 Pursuant to Fed. R. Civ. P. 16(b)(4) the parties stipulate to this motion for
20 modification of the pre-trial case schedule deadlines. On September 7, 2022, Plaintiff
21 Evanston Insurance Company (“Evanston”) filed a Stipulation to Amend Complaint for
22 Declaratory Judgment to include additional claimants that have recently filed suit against
23 Defendant Kenneth Eldon Parker.

24 The parties therefore propose modifying three of the pre-trial case schedule deadlines
25 by 60 days to allow Evanston to file and serve the Amended Complaint for Declaratory
26 Judgment upon the additional parties. The additional time will also allow the additional

1 parties to familiarize themselves with the facts surrounding this case.

2 For the above reasons, the parties respectfully request each of the following deadlines
 3 be extended by 60 days:

4 Event	5 Original Date	6 Proposed Date
Deadline for FRCP 26(f) Conference	September 9, 2022	November 11, 2022
Initial Disclosures Pursuant to FRCP 26(a)(1)	September 16, 2022	November 15, 2022
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	September 26, 2022	December 2, 2022

9
 10 All remaining deadlines remain the same.

11 DATED: September 13, 2022

12 BULLIVANT HOUSER BAILEY PC

13
 14 By /s/ Michael A. Guadagno

15 Michael A. Guadagno, WSBA #34633
 16 E-mail: michael.guadagno@bullivant.com
 Daniel D. Rhim, WSBA #58302
 17 E-mail: daniel.rhim@bullivant.com

18
 19 Attorneys for Plaintiff Evanston Insurance
 Company

20 SULLIVAN LAW GROUP, PLLC

21 By /s/ Cassidy D. Stevenson

22 Brian M. Sullivan, WSBA #38066
 Email: brian@sullivanpllc.com
 Cassidy D. Stevenson, WSBA #50569
 Email: cassidy@sullivanpllc.com

23
 24 Attorneys for Defendant Renee Sheeran, an
 individual

1 THE MARSHALL DEFENSE FIRM
2

3 By /s/ David S. Marshall
4 David S. Marshall, WSBA #11716
5 Email: david@marshalldefense.com
6
7
8
9
10
11

12 Attorney for Defendant Kenneth Eldon Parker, an
13 individual
14
15
16
17
18
19
20
21
22
23
24
25
26

ORDER

IT IS SO ORDERED.

Dated: October 3, 2022


13
14 HONORABLE BARBARA J. ROTHSTEIN
15
16
17
18
19
20
21
22
23
24
25
26